

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

ZACHARY CARAWAN,

Defendant.

Case No. 1:21-CR-153

STATEMENT OF FACTS

The United States and the defendant, ZACHARY CARAWAN (hereinafter, “the defendant”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. In or around January 2020, within the Eastern District of Virginia, the defendant did knowingly possess multiple images depicting minors engaged in sexually explicit conduct.
2. On or about October 15, 2019, a CyberTip from Microsoft indicated that four images of child pornography were uploaded from an Internet Protocol (“IP”) address resolving to a residence in Herndon, Virginia, within the Eastern District of Virginia. The IP address was registered to the defendant’s mother. A query of the address demonstrated that the defendant, a registered sex offender, also resided at this location.
3. On or about January 14, 2020, law enforcement officers executed a search warrant on the defendant’s residence. The defendant and his mother were the sole occupants of the residence at that time. While executing the warrant, officers seized an Apple iPhone 6S, with serial number C6KQL5V8GRXY, from the defendant’s person. A review of the phone showed that an iCloud user account labeled “Zachary Carawan” was logged into the phone, and the phone was listed as “Zach’s iPhone” in the device’s settings.

4. Analysis of the defendant's iPhone, which was manufactured outside of the Commonwealth of Virginia, revealed several thousand images in the iPhone's Photo Vault, many of which depicted child sexual abuse. The images were organized into labeled folders displaying the number of images contained in each. These folders included:

- a. Nn underage (6085 images)
- b. Nude preteen (6827 images)
- c. Hardcore child porn (1836 images)
- d. CP meme (250 images)
- e. Child Porn/PTHC/preteen nude (3017 images)
- f. Child porn gif (400)

5. Several of the images depicted minors engaged in a variety of sexually explicit conduct, including multiple images of male individuals penetrating prepubescent minors vaginally, males individuals with their penises in prepubescent minors' mouths, and prepubescent females with their genitals, pubic area, or anus lasciviously exhibited.

6. Moreover, the defendant possessed numerous child exploitation images that had been turned into "meme" descriptions of the child sexual abuse depicted in the imagery.

7. A subsequent search warrant executed on the defendant's email account revealed additional child exploitation images located in his google drive account, many of which also depicted child sexual abuse. The images found in the defendant's google drive included multiple images of prepubescent females with their genitals, anus, or pubic area graphically and lasciviously exhibited, and multiple images of male individuals penetrating prepubescent females vaginally and orally.

8. On or about May 28, 2015, the defendant was convicted of five counts of possession of child pornography in the Fairfax County Circuit Court located in Fairfax, Virginia. As a result of this conviction, the defendant is required to register as a sex offender with the Virginia State Police (VSP). This requirement includes registering his email addresses and certain other online usernames, such as social media accounts, with the VSP. Law enforcement's search of the defendant's iPhone revealed several email addresses and online accounts that the defendant failed to register with the VSP.

* * * * *

9. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

10. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Raj Parekh
Acting United States Attorney

Date: 07/12/2021


By: Whitney Kramer
Whitney Kramer
Special Assistant United States Attorney (LT)
Maya D. Song
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ZACHARY CARAWAN, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



ZACHARY CARAWAN

I am Cary Citronberg, the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Cary Citronberg, Esq.
Attorney for ZACHARY CARAWAN